



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

February 27, 2017

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Federal Savings Bank
Charter Number 707101

301 E 9th St Rochester, IN 46975-1617

Office of the Comptroller of the Currency

Indianapolis Field Office 8777 Purdue Road, Suite 105 Indianapolis, IN 46268

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

The Lending Test is rated: Outstanding.

The Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is considered more than reasonable
- The bank originated a substantial majority of loans inside the assessment area.
- The distribution of borrowers reflects reasonable penetration among individuals of different income levels.
- Geographic distribution of loans reflects excellent dispersion.
- Community development (CD) loans, investments, and services provide adequate responsiveness to the community development needs of the bank's assessment area.

Scope of Examination

First Federal Savings Bank (FFSB) was evaluated under the Intermediate Small Bank examination procedures, which include a Lending Test and a Community Development (CD) test. The Lending Test evaluates the bank's record of meeting the credit needs of its assessment areas (AAs) through its lending activities. The Lending Test for FFSB covers its performance from January 1, 2015 through December 31, 2016, as this is representative of its lending strategy since the last CRA evaluation. The Lending Test focused on the bank's primary lending products, which we determined to be home purchase, home improvement, and home refinance loans reported under the Home Mortgage Disclosure Act (HMDA). Home purchase loans were given more weight in the analysis, due to the larger volume of loans. We tested HMDA data to verify the accuracy of the data and determined it to be reliable.

The CD test evaluates the bank's responsiveness to CD needs in its AAs through CD lending, qualified investments, and community development services. The adequacy of a bank's responsiveness depends on its capacity for community development activities, AA needs, and the availability of opportunities within the AAs. The evaluation period for the CD test is from September 30, 2014 through February 27, 2017.

Description of Institution

FFSB is a federally chartered stock savings bank, wholly owned by American Midwest Financial Corporation, a unitary, non-diversified savings and loan holding company. FFSB is an intrastate bank headquartered in Rochester, IN. As of December 31, 2016, FFSB had total assets of \$376

million and tier one capital of \$42 million. In addition to the main office, FFSB operates five full-service branches and seven deposit taking automated teller machines (ATMs) within their AA. No branches have been opened or closed since the last CRA evaluation. There have been no significant changes to FFSB’s corporate structure, including merger or acquisition activities, since the last CRA evaluation.

The bank offers a full range of deposit and loan products and services. Lending products are mainly focused on residential-purpose loans in keeping with the bank’s business plan, to originate and sell residential loans in the secondary market. Other consumer-and-commercial-purpose lending is limited.

As of December 31, 2016, FFSB net loans totaled \$289 million or 76.95 percent of total assets. The loan portfolio composition is as follows:

FFSB's Investment in Loans			
Loan Category	Amount (\$000's)	Percent of Total Loans	Percent of Total Assets
Residential Real Estate	\$ 288,234	99.70%	76.75%
Commercial Loans	\$ 50	0.02%	0.01%
Consumer and Other Loans	\$ 709	0.25%	0.19%
Total	\$ 288,993	100%	76.95%

Source: December 31, 2016 Uniform Bank Performance Report

There were no legal or financial impediments to FFSB’s ability to meet the credit and CD needs of its AAs. The bank was rated Needs to Improve at its last CRA performance evaluation dated September 30, 2014.

Description of Assessment Area(s)

FFSB has three AAs, all receiving full-scope reviews. The AAs consist of two metropolitan statistical areas (MSAs) and one Non-MSA, all in Indiana. The AAs include St. Joseph county in the South Bend-Mishawaka IN-MI MSA (South Bend MSA), all of the Elkhart-Goshen IN MSA (Elkhart MSA), and a Non-MSA AA made up of five Indiana counties in their entirety (Fulton, Kosciusko, Marshall, Pulaski, and Starke counties). The Non-MSA AA carried the most weight as this is the location of the main office and three branches. The largest number and dollar volume of loans were made in this AA. The Non-MSA AA has four of the bank’s six branches and 86 percent of the bank’s deposits. The next largest AA was the South Bend MSA. The bank has one full-service branch in St. Joseph County with 8 percent of the bank’s deposits. The bank also has one branch in the remaining Elkhart MSA with 6 percent of the bank’s deposits.

Competition from other financial institutions is strong. The bank’s competitors include local community banks, branches of several large financial institutions, and several mortgage/finance companies.

Non-MSA AA

The Non-MSA AA is comprised of five counties in Indiana: Fulton, Kosciusko, Marshall, Pulaski, and Starke. These counties are located in northern Indiana and are adjacent to both the Elkhart MSA and the South Bend MSA. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The bank’s main office and three branches are located within the AA. The main office and one ATM are located in Fulton County, in a moderate-income census tract. Two full service branches and three ATMs are located in Marshall County, with one branch and two ATMs in a moderate-income tract and one branch and ATM in a middle-income census tract. One branch and ATM are located in Pulaski County, in a middle-income census tract. The bank has the fourth largest deposit market share in the AA at 8.09 percent. Within the AA, there are no low-income, four moderate-income, 35 middle-income, and nine upper-income census tracts. The FFIEC estimated median family income for 2015 was \$56,700 and \$57,100 for 2016.

The current local economy is characterized as good. Economic activity in the area is relatively diverse, with the service industry, retail trade and agriculture being the largest employers. Despite the economic stability, a community contact from the AA noted a need for assistance for first-time home buyers. The community contact noted assistance for first-time home buyers would improve the housing market in the local area. He also stated the area could benefit from basic financial literacy programs for both individuals and businesses.

Demographic Information for Full Scope Area: First FSB Non-MSA AA					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts/BNAs)	48	0.00	8.33	72.92	18.75
Population by Geography	182,010	0.00	8.87	71.84	19.29
Owner-Occupied Housing by Geography	54,813	0.00	6.57	73.61	19.82
Business by Geography	10,333	0.00	16.13	66.06	17.81
Farms by Geography	1,095	0.00	2.37	75.71	21.92
Family Distribution by Income Level	51,112	17.53	18.74	23.71	40.03
Distribution of Low and Moderate Income Families throughout AA Geographies	18,536	0.00	13.29	74.36	12.35
Median Family Income		53,037	Median Housing Value		121,433
FFIEC Adjusted Median Family Income for 2016		57,100	Unemployment Rate (December 2016 BLS)		4.16%
Households Below Poverty Level		11%			

Source: 2010 US Census; 2016 BLS, and 2016 FFIEC updated MFI

South Bend-Mishawaka IN-MI MSA

The South Bend MSA is comprised of two counties, St. Joseph County in Indiana and Cass County in Michigan. The bank’s AA only includes St. Joseph County in northern Indiana. This AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income areas. The bank has one full service branch and one ATM in this AA, located

in a moderate-income census tract. The bank has the 10th largest deposit market share at 0.56 percent. There are eight low-income, 24 moderate-income, 24 middle-income, and 19 upper-income census tracts in the AA. The FFIEC estimated median family income for 2015 was \$57,300 and \$52,900 for 2016.

A community contact from this assessment area noted a need for rental property financing. The community contact also noted a need for more affordable housing for senior citizens and identified this as a potential area for community development lending.

Demographic Information for Full Scope Area: First FSB South Bend-Mishawaka IN-MI MSA					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts/BNAs)	75	10.67	32.00	32.00	25.33
Population by Geography	266,931	4.59	27.75	36.27	31.40
Owner-Occupied Housing by Geography	71,879	2.22	21.95	37.41	38.43
Business by Geography	14,591	8.27	24.91	34.60	32.22
Farms by Geography	442	1.13	10.41	43.21	45.25
Family Distribution by Income Level	64,970	20.35	18.06	20.94	40.65
Distribution of Low and Moderate Income Families throughout AA Geographies	24,957	7.07	41.63	34.32	16.99
Median Family Income		57,040	Median Housing Value		115,494
FFIEC Adjusted Median Family Income for 2016		52,900	Unemployment Rate (December 2016 BLS)		4.2%
Households Below Poverty Level		13%			

Source: 2010 US Census; 2016 BLS, and 2016 FFIEC updated MFI

Elkhart-Goshen IN MSA

The Elkhart MSA is comprised of one county, Elkhart County. The bank has one full service branch and one ATM in the AA, located in a moderate-income census tract. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income areas. The bank has the 10th largest deposit market share at 0.63 percent. There are no low-income, eight moderate-income, 19 middle-income and nine upper-income census tracts in the AA. The FFIEC estimated median family income for 2015 was \$53,300 and \$52,300 for 2016.

Demographic Information for Full Scope Area: First FSB Elkhart-Goshen IN MSA					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts/BNAs)	36	0.00	22.22	52.78	25.00
Population by Geography	197,559	0.00	17.02	53.84	29.14
Owner-Occupied Housing by Geography	50,922	0.00	13.11	55.62	31.27
Business by Geography	11,179	0.00	17.15	54.83	28.03
Farms by Geography	513	0.00	4.87	47.17	47.95
Family Distribution by Income Level	50,376	17.81	19.19	22.78	40.22
Distribution of Low and Moderate Income Families throughout AA Geographies	18,638	0.00	25.12	56.68	18.20
Median Family Income		53,742	Median Housing Value		124,510
FFIEC Adjusted Median Family Income for 2016		52,300	Unemployment Rate (December 2016 BLS)		3.1%
Households Below Poverty Level		12%			

Source: 2010 US Census; 2016 BLS, and 2016 FFIEC updated MFI

Conclusions with Respect to Performance Tests

LENDING TEST

FFSB’s performance in helping meet the needs of its AAs through lending is outstanding, given the demographics, economic factors, competitive pressures, credit needs of the community and other lending related activity. In our evaluation, we gave the most weight to home purchase loans, with the greatest volume, then home improvement loans, and lastly home refinance loans.

Loan-to-Deposit Ratio

FFSB’s quarterly loan-to-deposit ratio is more than reasonable, given the institution’s size, its financial condition, and AA credit needs.

FFSB’s quarterly loan-to-deposit (LTD) ratio averaged 92.44 percent during the 13 quarters from December 31, 2013 to December 31, 2016. The ratio ranged from a high of 96.58 percent on September 30, 2014 to a low of 84.89 percent as of March 31, 2016.

The ratio is above that of similarly situated banks. FFSB ranks third out of a total of six similarly situated banks serving its AA. The other five banks had average LTD ratios ranging from 62.32 percent to 94.69 percent. In addition, FFSB LTD ratio does not reflect the volume of sold loans originated during the period. If sold loans were included the bank’s LTD ratio would be higher.

Lending in Assessment Area

A substantial majority of the primary loan products originated by FFSB are to customers within their AAs. During the evaluation period, the bank made 89.74 percent of loans in their AAs by number and 86.03 percent by dollar.

Lending in Assessment Areas										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Purchase	1,741	90.49	183	9.51	1,924	\$232,717	87.56	\$33,056	12.44	\$265,773
Home Improvement	794	87.16	117	12.84	911	\$100,325	81.36	\$22,984	18.64	\$123,309
Home Refinance	727	90.88	73	9.13	800	\$86,001	87.77	\$11,981	12.23	\$97,982
Totals	3,262	89.74	373	10.26	3,635	\$419,043	86.03	\$68,021	13.97	\$487,064

Source: Data reported under 2015-2016HMDA.

Lending to Borrowers of Different Incomes

FFSB’s lending distribution of home purchase and home improvement loans to low- and moderate-income borrowers reflects reasonable penetration. Lending distribution to low- and moderate-income borrowers in the Non-MSA AA and the Elkhart MSA AA are reasonable; however, distribution in the South Bend MSA AA is poor.

Non-MSA

The distribution of loans to borrowers of low- and moderate-income in the Non-MSA AA is reasonable. The percentage of home purchase, home improvement, and home refinance loans made to low-income borrowers are below the percent of low-income families in the AA, but within a reasonable range to that of other lenders in the AA. Home purchase loans and home improvement loans to moderate-income borrowers are above the percent of moderate-income families in the AA and also comparable to the percentage of loans made by other lenders in the area.

Borrower Distribution of Residential Real Estate Loans in Non-MSA Assessment Area							
Borrower Income Level	% Total FFSB Loans			% of Loans by AA Lenders			% of AA Families by Income Level
Loan Type	Home Purchase	Home Improvement	Home Refinance	Home Purchase	Home Improvement	Home Refinance	
Low	8.42	8.61	5.56	9.52	11.55	7.56	17.53
Moderate	28.29	19.33	20.37	27.22	19.80	19.23	18.74
Middle	25.05	26.89	26.85	27.08	29.04	27.72	23.71
Upper	38.23	45.17	47.22	36.17	39.60	45.49	40.03

Source: Data reported under 2015-2016HMDA; 2015 Peer Mortgage Data; and 2010 U.S. Census Data.

South Bend-Mishawaka IN-MI MSA

The distribution of loans to borrowers of low- and moderate-income in the South Bend MSA AA is poor. The bank’s lending to low-income borrowers is significantly below both the percentage of low-income families in the AA and the performance of other lenders in the AA for home purchase loans and home improvement loans. The bank’s home refinance lending to low-income borrowers is also below the percentage of refinance loans by other AA lenders but within a reasonable range.

The percentage of home purchase loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. The percentage of home improvement loans to moderate-income borrowers was near the percentage of moderate-income families in the AA. Both the percentage of home purchase and home improvement loans to moderate-income borrowers were below the percentage of loans by other AA lenders. The percentage of home refinance loans to moderate-income borrowers slightly exceeds the percentage by other AA lenders and exceeds the percentage of moderate-income families in the AA.

Borrower Distribution of Residential Real Estate Loans in South Bend-Mishawaka IN-MI MSA Assessment Area							
Borrower Income Level	% Total FFSB Loans			% of Loans by AA Lenders			% of AA Families by Income Level
Loan Type	Home Purchase	Home Improvement	Home Refinance	Home Purchase	Home Improvement	Home Refinance	
Low	6.02	4.60	5.15	11.30	15.43	8.27	20.35
Moderate	20.65	13.22	21.32	27.59	20.99	21.14	18.06
Middle	21.94	22.99	26.47	26.63	26.23	26.58	20.94
Upper	51.40	59.20	47.06	34.49	37.35	44.01	40.65

Source: Data reported under 2015-2016 HMDA; 2015 Peer Mortgage Data; and 2010 U.S. Census Data.

Elkhart-Goshen IN MSA

The distribution of loans to borrowers of low- and moderate-income in the Elkhart MSA AA is reasonable. The distribution of loans to low-income borrowers in the AA is poor, but the distribution to moderate-income borrowers is reasonable.

The bank’s percentage of home purchase loans to low-income borrowers is within a reasonable range below that of other lenders in the AA. Home improvement and home refinance loans to low-income borrowers are both below the percentages for other lenders in the AA. Home purchase, home improvement, and home refinance lending were all significantly below the percentage of low-income families in the AA.

Home purchase loans to moderate-income borrowers is below that of other lenders in the AA but exceeds the percentage of moderate-income borrowers in the AA. The bank’s home improvement and home refinance loans made to moderate-income borrowers are both slightly below, but within a reasonable range, to those made by other lenders in the AA, and the percentage of moderate-income families in the AA.

Borrower Distribution of Residential Real Estate Loans in Elkhart-Goshen IN MSA Assessment Area							
Borrower Income Level	% Total FFSB Loans			% of Loans by AA Lenders			% of AA Families by Income Level
Loan Type	Home Purchase	Home Improvement	Home Refinance	Home Purchase	Home Improvement	Home Refinance	
Low	4.29	2.78	3.77	6.44	6.84	6.30	17.81
Moderate	22.86	17.36	18.87	27.33	20.00	19.02	19.19
Middle	23.43	25.00	27.04	31.47	23.16	28.29	22.78
Upper	49.43	54.86	50.31	34.76	50.00	46.40	40.22

Source: Data reported under 2015-2016 HMDA; 2015 Peer Mortgage Data; and 2010 U.S. Census Data.

Geographic Distribution of Loans

The overall geographic distribution of FFBSB’s home purchase and home improvement loans in low-and moderate-income geographies reflects excellent dispersion.

Non-MSA

There are no low-income census tracts in the AA. The geographic distribution of loans to moderate-income census tracts reflects excellent dispersion. The bank’s percentage of home purchase loans in moderate-income census tracts is well above the percentage made by other lenders in the AA, and is also well above the percentage of owner-occupied housing units in the AA. The bank’s percentage of home refinance also exceeded the percentage of loans made by other AA lenders, and was in line with the percentage of owner-occupied housing units in the AA. The bank’s percentage of home improvement loans is similar to other lenders in the AA and above the percentage of owner-occupied housing units in the AA.

Geographic Distribution of Residential Real Estate Loans in Non-MSA Assessment Area							
Census Tract Income Level	% Total FFBSB Loans			% of Loans by AA Lenders			% of AA Owner Occupied Housing Units
Loan Type	Home Purchase	Home Improvement	Home Refinance	Home Purchase	Home Improvement	Home Refinance	
Low	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Moderate	10.26	8.19	6.48	6.32	8.25	4.92	6.57
Middle	67.28	66.18	61.57	71.77	69.21	70.17	73.61
Upper	22.46	25.63	31.94	21.91	22.54	24.92	19.82

Source: Data reported under 2015-2016 HMDA; 2015 Peer Mortgage Data; and 2010 U.S. Census Data.

South Bend-Mishawaka IN-MI MSA

The geographic distribution of loans to low- and moderate-income census tracts reflects reasonable dispersion. The bank did not originate or purchase any home purchase or home improvement loans in low-income census tracts; however, this performance is similar to the percentage made by other lenders in the AA. The bank’s percentage of home refinance loans in the low-income census tract is below the percentage of other AA lenders, but within a reasonable range. Out of the 75 census tracts in the AA, only eight are low income. The areas designated low-income are generally industrial areas within the inner-city.

The bank’s percentage of home purchase and home improvement loans in moderate-income census tracts is slightly below that of other AA lenders. The percentage of home refinance loans was above the percentage of home refinance loans by other AA lenders.

Geographic Distribution of Residential Real Estate Loans in South Bend-Mishawaka IN-MI MSA Assessment Area							
Census Tract Income Level	% Total FFBSB Loans			% of Loans by AA Lenders			% of AA Owner Occupied Housing Units
Loan Type	Home Purchase	Home Improvement	Home Refinance	Home Purchase	Home Improvement	Home Refinance	
Low	0.00	0.00	0.74	0.96	1.71	0.96	2.22
Moderate	16.99	14.37	14.71	17.24	16.57	13.33	21.95
Middle	38.06	40.80	37.50	36.86	35.43	36.36	37.41
Upper	44.95	44.83	47.06	44.95	46.29	49.36	38.43

Source: Data reported under 2015-2016 HMDA; 2015 Peer Mortgage Data; and 2010 U.S. Census Data.

Elkhart-Goshen IN MSA

There are no low-income census tracts in the AA. The geographic distribution of loans in moderate-income census tracts reflects reasonable dispersion. The bank’s percentage of home purchase and home improvement loans in moderate-income census tracts is similar to that of other lenders in the AA. The bank’s percentage of home refinance loans in moderate-income census tracts is below the percentage of refinance loans by other AA lenders but within a reasonable range.

Geographic Distribution of Residential Real Estate Loans in Elkhart-Goshen IN MSA Assessment Area							
Census Tract Income Level	% Total FFSB Loans			% of Loans by AA Lenders			% of AA Owner Occupied Housing Units
Loan Type	Home Purchase	Home Improvement	Home Refinance	Home Purchase	Home Improvement	Home Refinance	
Low	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Moderate	10.57	9.03	6.29	9.95	10.84	9.65	13.11
Middle	56.57	50.69	52.83	52.68	47.78	52.04	55.62
Upper	32.86	40.28	40.88	37.37	41.38	38.31	31.27

Source: Data reported under 2015-2016 HMDA; 2015 Peer Mortgage Data; and 2010 U.S. Census Data.

Responses to Complaints

There were no consumer complaints related to the bank’s CRA performance during the evaluation period.

COMMUNITY DEVELOPMENT TEST

FFSB’s performance under the community development (CD) test is satisfactory. FFSB’s CD performance demonstrates adequate responsiveness to the community development needs of its AA, considering its performance context and the needs and opportunities within its AA.

Number and Amount of Community Development Loans

The bank’s community development lending performance demonstrates adequate responsiveness to the community development needs of its AAs through qualified loans considering the bank’s capacity and the need and availability of such opportunities in the bank’s AAs. FFSB made two CD loans during the evaluation period totaling \$331,500.

All community development lending for the evaluation period were within the Non-MSA AA. This AA is given the most weight in the review. Community development lending is limited in the other AAs due to the strong competition in those areas, in addition to the minimal presence by the bank. FFSB operates three branches in addition to the main office within the Non-MSA AA, versus one branch in each of the two other AAs.

Non-MSA

FFSB made two loans in the Non-MSA totaling \$331,500. One loan was made in Marshall County for \$297,500 to fund a residence that will be used as a bed and breakfast. The loan

qualifies as economic development and will help retain several jobs. FFSB also made a \$34,000 loan to purchase equipment for a local barbershop and furniture store. This loan also qualifies as economic development and will allow the business to continue operating. The business operates in a moderate-income census tract and employs several local individuals. This AA is given the most weight in the review.

South Bend-Mishawaka IN-MI MSA

FFSB did not make any community development loans in the South Bend MSA.

Elkhart-Goshen IN MSA

FFSB did not make any community development loans in the Elkhart MSA.

Number and Amount of Qualified Investments

The bank's qualified investment performance demonstrates adequate responsiveness to the community development needs of its AAs through qualified investments considering the bank's capacity and the need and availability of such opportunities in the bank's AAs. FFSB made a total of \$5.9 million in qualified investments during the evaluation period, in the form of grants, donations, and investments purchased.

Non-MSA

FFSB's community development investment performance demonstrates adequate responsiveness to the community development needs of the Non-MSA AA. The bank provided donations and grants totaling \$37,716 in the Non-MSA AA during the evaluation period. The donations and grants were to various organizations in the AA that assist low- and moderate-income individuals and support affordable housing. The organizations included homeless shelters, food pantries, Habitat for Humanity, and various organizations supporting low- and moderate-income youth.

South Bend-Mishawaka IN-MI MSA

FFSB's community development investment performance demonstrates adequate responsiveness to the community development needs of the South Bend MSA AA. FFSB made a significant financial commitment to the Monroe Circle Community Center, donating \$54,644 during the review period, to run the financial literacy program. The bank also donated \$11,450 to the Center for the Homeless. Qualified investments in the South Bend MSA AA totaled \$73,594 during the evaluation period.

Elkhart-Goshen IN MSA

FFSB's community development investment performance demonstrates excellent responsiveness to the community development needs of the Elkhart MSA AA. The bank provided donations, grants and investments totaling \$3,507,500 in the AA during the evaluation period. The donations and grants were to various organizations in the assessment area that assist low- and moderate-income individuals and support affordable housing. The largest investments were the Cinnaire Indiana Community Fund 19-4 and the Solomon Hess SBA Loan Fund. For the Cinnaire investment, the bank invested in an affordable housing tax credit in the amount of \$2 million. Through the Solomon Hess investment, FFSB supported small businesses in the AA by

purchasing the guaranteed portion of SBA loans made in the AA, which helps provide liquidity for small business lenders. The balance as of our evaluation is \$1.5 million.

FFSB also continues to donate to LaCasa, Inc., which provides homeownership training, repairs, and renovations, and other housing services to low- and moderate-income individuals and families. FFSB donated \$4,500 to LaCasa, Inc. during the evaluation period.

Statewide, Non AA Specific

The bank participated in a statewide version of the Cinnaire Indiana Community Fund (19-2). This \$2.3 million investment provides statewide affordable housing projects. Because the bank satisfactorily served their AA, they also receive credit for serving the broader statewide/region area.

Extent to Which the Bank Provides Community Development Services

The bank's community development service performance demonstrates adequate responsiveness to the community development needs of its AAs through community development services considering the bank's capacity and the need and availability of such opportunities in the bank's AAs.

Non-MSA

Seven employees provided community development services to 11 organizations during the review period, which is summarized below:

- A FFSB representative served on the Finance Committee for the Northern Indiana Community Foundation which provides donations to support education and non-profits in LMI geographies.
- A FFSB representative served on the Board of Directors for the Rochester Redevelopment Commission which targets the redevelopment of LMI geographies.
- A FFSB representative served on the Board of Directors for the Fulton County Housing Authority which provides affordable housing to LMI individuals.
- A FFSB representative served on the Board of Directors for the Times Theater which creates jobs for LMI individuals.
- A FFSB representative served on the Board of Directors for Fulton County CASA which provides services to LMI children.
- A FFSB representative served on the Board of Directors for Junior Achievement of Rochester which teaches elementary school students the use of money and finances in a real world setting. A majority of the schools in the county qualify for the free or reduced lunch proxy.

- A FFSB representative served on the Board of Directors for Fulton County Habitat for Humanity and provides financial counseling to families.

In addition to the services above, multiple employees continue to provide loan modification assistance and prepare loan-closing documents for the Fulton County chapter of Habitat for Humanity. These employees conduct free loan closings on all of the Chapter's loans.

South Bend-Mishawaka IN-MI MSA

Two employees provided CD services to organizations during the review period, as summarized below:

- A FFSB representative served on the Board of Directors and Finance Committee for Families First Center, which provides services to LMI families.
- A FFSB representative served on the Board of Directors and acted as a facilitator for Bridges Out of Poverty, which provides financial management classes to low- and moderate income individuals. Bridges Out of Poverty is partnership with Monroe Circle Community Center (MC3).

Various bank employees spent numerous hours during the evaluation period with MC3 helping organize the MC3 financial education program aimed at LMI individuals, and assisting with various financial planning services. The program targets adults, teens, and children on the near west side of South Bend who live below the poverty level.

Elkhart-Goshen IN MSA

Services in this AA were limited to employees assisting with loan modifications in the AA.

Responsiveness to Community Development Needs

FFSB's community development performance demonstrates adequate responsiveness to the community development needs of its AAs through community development loans, qualified investments, and community development services considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.